

Kenneth L. Neeley, 025899  
Christopher J. Dutkiewicz, 024962  
Nicholas T. Van Vleet, 026933  
Dane Paulsen, 029225  
Daniel Taylor, 032094  
**NEELEY LAW FIRM, PLC**  
2250 E. Germann Rd., Ste. 11  
Chandler, Arizona 85286  
Tel: 480.802.4647 | Fax: 480.907.1648  
[ECF@neeleylaw.com](mailto:ECF@neeleylaw.com)  
*Attorneys for Debtor*

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF ARIZONA**

In Re:

LACHELLE LACRISH MOORE,  
  
Debtor.

Chapter 13  
Case No.: 2:19-bk-04351-EPB

**MOTION TO INCUR DEBT**

LaChelle Moore ("Debtor"), hereby moves this court for an order allowing her to finance the purchase of a vehicle pursuant to Local Bankruptcy Rule 2084-25(a).

1. On April 11, 2019, Debtor filed for relief under Chapter 13 of the Bankruptcy Code.

2. On the petition date, Debtor owed CAG Acceptance, LLC for a 2010 Mazda CX-7 (the "Collateral").

3. Debtor filed a Third Amended Plan wherein she will surrender interest in the Collateral because it is no longer reliable transportation.

4. Debtor would like to purchase a new vehicle due to the fact that the Collateral is not operable.

5. The purchase of a replacement vehicle is necessary for Debtor's employment.

6. Debtor estimates she they will need to borrow no more than \$21,587.04 and that the corresponding monthly payment will be no more than \$299.82 with 15.99% interest.

7. Debtor is current on plan payments and Debtor is not in default under the terms of the Chapter 13 Plan.

**WHEREFORE**, Debtor requests that the court enter an Order:

- 1 A. Allowing Debtor to incur debt to finance the purchase of a motor vehicle provided:
- 2 a. The new debt is a single loan to purchase a vehicle and the only security given for
- 3 the new debt will be the vehicle;
- 4 b. The new debt does not exceed \$21,587.04;
- 5 c. The repayment term for the new debt does not exceed 72 months;
- 6 d. The monthly loan payment does not exceed \$299.82;
- 7 e. The new debt will not prejudice the class of general unsecured creditors; and
- 8 B. For other such relief that the Court deems necessary.

9 DATED: August 1, 2019

NEELEY LAW FIRM, PLC

11 /s/ Kenneth L. Neeley

12 Kenneth L. Neeley  
13 Christopher J. Dutkiewicz  
14 Nicholas T. Van Vleet  
15 Dane Paulsen  
16 Daniel Taylor  
17 Attorneys for Debtor  
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